

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

)	
In re)	Case No. 13-53846
)	
CITY OF DETROIT, MICHIGAN,)	In Proceedings Under
)	Chapter 9
Debtor.)	
)	Hon. Steven W. Rhodes

**CERTIFICATION OF NO RESPONSE OR OBJECTION
REGARDING AMBAC ASSURANCE CORPORATION'S
NOTICE OF ASSERTED RIGHT TO VOTE A CLAIM**

On May 23, 2014, Ambac Assurance Corporation's Notice of Asserted Right to Vote a Claim [ECF No. 5030] (the "Motion") was filed and served by Ambac Assurance Corporation ("Ambac") on the Court's electronic case filing and noticing system. A copy of the original Certificate of Service included with the Motion as Exhibit 4 is attached hereto as Exhibit A,

Attached to the Motion as Exhibit 2 was a Notice and Opportunity to Object. Pursuant to the applicable orders of this Court, the Notice and Opportunity to Object identified June 24, 2014 as the deadline for objections to the Motion (the "Objection Deadline").¹ A copy of the Notice and Opportunity to Object is attached hereto as Exhibit B.

¹ See Order (I) Establishing Procedures For Solicitation And Tabulation Of Votes To Accept Or Reject Plan Of Adjustment And (II) Approving Notice Procedures Related To Confirmation Of The Plan Of Adjustment [ECF No. 2984], ¶ 9(a);

No response or objection to the Motion was filed with the Court by the Objection Deadline. Accordingly, pursuant to Rule 9014(c) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Michigan, Ambac respectfully requests that the Court enter a final order in the form attached as Exhibit 1 to the Motion and attached hereto as Exhibit C.

Dated: June 30, 2014

Respectfully Submitted,
ARENT FOX LLP

By: /s/ Carol Connor Cohen
Carol Connor Cohen
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-and-

SCHAFFER AND WEINER, PLLC
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Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment [ECF No. 4202], ¶ 10; and the Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment [ECF No. 5259], ¶ 2.

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Email: bbest@schaferandweiner.com

Attorneys for Ambac Assurance Corporation

Exhibit A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

)	
In re)	Case No. 13-53846
)	
CITY OF DETROIT, MICHIGAN,)	In Proceedings Under
)	Chapter 9
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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2014, Ambac Assurance Corporation's Notice of Asserted Right to Vote a Claim and Brief in Support were filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

Respectfully Submitted,

ARENT FOX LLP

Dated: May 23, 2014

By: /s/ Carol Connor Cohen
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Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

_____)	
In re)	Case No. 13-53846
)	
CITY OF DETROIT, MICHIGAN,)	In Proceedings Under
)	Chapter 9
Debtor.)	
_____)	Hon. Steven W. Rhodes

NOTICE AND OPPORTUNITY TO OBJECT

Ambac Assurance Corporation (“Ambac”), by and through its respective undersigned attorneys, has filed its Notice of Right to Vote Claim (the “Voting Notice”) and pursuant to ¶ 9(a) of the Order (I) Establishing Procedures For Solicitation And Tabulation Of Votes To Accept Or Reject Plan Of Adjustment And (II) Approving Notice Procedures Related To Confirmation Of The Plan Of Adjustment [ECF No. 2984] (the “Solicitation Order”) and the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment [ECF No. 4202] (the “Fourth Amended Scheduling Order,” and together with the Solicitation Order, the “Orders”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

Pursuant to ¶ 9(c) of the Solicitation Procedures Order, any holder affected by the Voting Notice, or any representative thereof, are permitted to file and serve on the ECF noticing list a brief in response (“Response”) to the Voting Notice.

All Responses must be filed with the Court on or before **June 24, 2014** at:

United States Bankruptcy Court
Eastern District of Michigan
211 W. Fort Street, Suite 2100
Detroit, MI 48226

If you mail your Response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

If a Response is timely filed and served, a hearing on the Voting Notice will be held on **July 14, 2014** at which the Court shall hear and determine any disputes arising in connection with the Voting Notice.

If you or your attorney do not take these steps, the Court will grant the relief sought in the Voting Notice.

Dated: May 23, 2014

Respectfully Submitted,
ARENT FOX LLP

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Exhibit 2-2

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Attorneys for Ambac Assurance Corporation

Exhibit C

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)
)
)
)
)
)
)

Case No. 13-53846

In Proceedings Under
Chapter 9

Hon. Steven W. Rhodes

**ORDER AUTHORIZING AMBAC ASSURANCE CORPORATION TO
VOTE CERTAIN CLASS 7 LIMITED TAX GENERAL OBLIGATION
BOND CLAIMS AND CERTAIN CLASS 8 UNLIMITED TAX GENERAL
OBLIGATION BOND CLAIMS**

This matter coming before the Court on Ambac Assurance Corporation's Notice of Asserted Right to Vote a Claim (the "Voting Notice"), filed by Ambac Assurance Corporation ("Ambac"); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. Ambac is the sole party authorized to vote the Ambac Bond Claims,¹ as set forth in the Voting Notice.
2. The City shall disregard any votes submitted on the Ambac Bond Claims by any party other than Ambac.

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Voting Notice.